1	WILMER CUTLER PICKERING	ARI HOLTZBLATT (pro hac vice)		
2	HALE AND DORR LLP	Ari.Holtzblatt@wilmerhale.com		
3	SONAL N. MEHTA (SBN 222086) Sonal.Mehta@wilmerhale.com	MOLLY M. JENNINGS (pro hac vice) Molly.Jennings@wilmerhale.com		
4	2600 El Camino Real, Suite 400 Palo Alto, California 94306	2100 Pennsylvania Avenue NW Washington, DC 20037		
5	Telephone: (650) 858-6000	Telephone: (202) 663-6000		
6	DAVID Z. GRINGER (pro hac vice) David.Gringer@wilmerhale.com	MICHAELA P. SEWALL (pro hac vice)		
7	ROSS E. FIRSENBAUM (pro hac vice)	Michaela.Sewall@wilmerhale.com 60 State Street		
8	Ross.Firsenbaum@wilmerhale.com RYAN CHABOT (pro hac vice)	Boston, Massachusetts 02109 Telephone: (617) 526-6000		
9	Ryan.Chabot@wilmerhale.com PAUL VANDERSLICE (pro hac vice)	r		
10	Paul.Vanderslice@wilmerhale.com 7 World Trade Center			
11	250 Greenwich Street			
12	New York, New York 10007 Telephone: (212) 230-8800			
13				
14	Attorneys for Defendant Meta Platforms, Inc.			
15	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA			
16				
17	SAN FRANCISCO DIVISION			
18	MAXIMILIAN KLEIN, et al., on behalf of	Case No. 3:20-cv-08570-JD		
19	themselves and all others similarly situated,	[PROPOSED] ORDER REGARDING META PLATFORMS, INC.'S ADMINISTRATIVE MOTION TO SEAL		
20	Plaintiffs,			
21	v.			
22	META PLATFORMS, INC., a Delaware	Judge: Hon. James Donato		
23	Corporation,			
24	Defendant.			
25				
26				
27				
28				

Defendant's Administrative Motion to Seal, filed in connection with the concurrently filed Motion to Exclude Testimony of Scott Fasser and Joshua Gans, dated September 15, 2023 (the "Motion"), is now before the Court. Upon consideration, this Court **GRANTS** the Administrative Motion.

Accordingly, the following portions of the Motion shall be sealed.

Document	Portions to	Reason For Sealing
	Be Lodged	
Matala Matian to Employed the Tradition	Under Seal	Detential Hanne to Mate
Meta's Motion to Exclude the Testimony	Portions	Potential Harm to Meta
of Scott Fasser and Joshua S. Gans	highlighted in	
Ev. 2 to the Deal of Melly M. Jannings in	green	Detential Horne to Mate and
Ex. 2 to the Decl. of Molly M. Jennings in	In its entirety	Potential Harm to Meta and Advertiser Plaintiffs'
Support of Meta's Motion to Exclude the		Confidential Information
Testimony of Scott Fasser and Joshua S.		Confidential information
Gans ("Fasser Reply Report") Ex. 3 to the Decl. of Molly M. Jennings in	In its entirety	Potential Harm to Meta and
	in its entirety	Advertiser Plaintiffs'
Support of Meta's Motion to Exclude the		Confidential Information
Testimony of Scott Fasser and Joshua S.		Confidential information
Gans ("Fasser Deposition Excerpts") Ex. 4 to the Decl. of Molly M. Jennings in	In its entirety	Potential Harm to Meta and
Support of Meta's Motion to Exclude the	in its entirety	Advertiser Plaintiffs'
Testimony of Scott Fasser and Joshua S.		Confidential Information
Gans ("Gans Report")		Confidential information
Ex. 5 to the Decl. of Molly M. Jennings in	In its entirety	Potential Harm to Meta and
Support of Meta's Motion to Exclude the	In its entirety	Advertiser Plaintiffs'
Testimony of Scott Fasser and Joshua S.		Confidential Information
Gans ("Gans Reply Report")		
Ex. 6 to the Decl. of Molly M. Jennings in	In its entirety	Potential Harm to Meta and
Support of Meta's Motion to Exclude the		Advertiser Plaintiffs'
Testimony of Scott Fasser and Joshua S.		Confidential Information
Gans ("Williams Report")		
Ex. 7 to the Decl. of Molly M. Jennings in	In its entirety	Potential Harm to Meta
Support of Meta's Motion to Exclude the		
Testimony of Scott Fasser and Joshua S.		
Gans ("Smallwood Deposition Excerpts")		
Ex. 8 to the Decl. of Molly M. Jennings in	In its entirety	Potential Harm to Meta
Support of Meta's Motion to Exclude the	_	
Testimony of Scott Fasser and Joshua S.		
Gans ("Eide Deposition Excerpts")		
Ex. 9 to the Decl. of Molly M. Jennings in	In its entirety	Potential Harm to Meta
Support of Meta's Motion to Exclude the		
Testimony of Scott Fasser and Joshua S.		
Gans ("Bosworth Deposition Excerpts")		

Case 3:20-cv-08570-JD Document 646-2 Filed 09/15/23 Page 3 of 3

1	Ex. 10 to the Decl. of Molly M. Jennings in	In its entirety	Potential Harm to Meta				
2	Support of Meta's Motion to Exclude the Testimony of Scott Fasser and Joshua S.						
3	Gans ("Goldman Deposition Excerpts")						
4	Ex. 11 to the Decl. of Molly M. Jennings in Support of Meta's Motion to Exclude the	In its entirety	Potential Harm to Meta				
	Testimony of Scott Fasser and Joshua S.						
5	Gans ("Baser Deposition Excerpts")						
6							
7	IT IS SO ORDERED.						
8	II IS SO ORDERED.						
9							
10	Dated: September, 2023						
11			able James Donato es District Court Judge				
12		Omica Stat	es District Court suage				
13							
14							
15							
16							
17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28							

No. 3:20-cv-08570-JD

[PROPOSED] ORDER RE META'S MOTION TO SEAL